

June D. Coleman (SBN 191890)  
MESSER STRICKLER, LTD.  
5960 South land Park Drive #1059  
Sacramento, CA 95822  
(916) 502-1768 (direct)  
((312) 334-3473 (fax)  
[jcoleman@messerstrickler.com](mailto:jcoleman@messerstrickler.com)

Attorney for Defendant  
VAN RU CREDIT CORPORATION

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

WARREN SPIES,

Plaintiff,

vs.

VAN RU CREDIT CORPORATION,

Defendants.

CASE NO. 2:20-cv-00341-TLN-CKD

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

The parties had previously agreed to a 28-day extension to respond to the Complaint, which was served on February 24. Based on this agreement, the response would then be due on April 13, 2020. Defendant, Van Ru Credit Corporation, through its undersigned counsel, needs additional time to prepare a response because Van Ru Credit Corporation is no longer operational, its records are archived in Chicago, IL, the records can only be accessed by going into the office in Chicago, and Illinois is currently under a stay at home order due to the COVID 19 pandemic. Given the projections regarding the course of COVID 19 in the United

1 States, Defendant hopes that it will be able to access its records and respond to the  
2 Complaint by mid-July. Based on this, the parties have agreed to extend the time  
3 to respond by an additional 90 days to July 13.

4 Given this Stipulation, signed by the counsel for the parties, the parties  
5 respectfully request that this Court permit Defendant to respond to the Complaint  
6 by July 13, 2020, in accordance with Local Rules 143 and 230(f) of the Eastern  
7 District of California.  
8

9 DATED: April 8, 2020

MESSER STRICKLER, LTD.

11 By: /s/ June D. Coleman  
12 June D. Coleman  
13 Attorney for Defendant  
14 VAN RU CREDIT CORPORATION

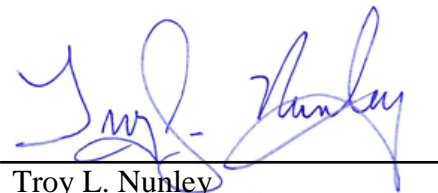
15 DATED: April 8, 2020

KIMMEL & SILVERMAN, P.C.

16 By: /s/ Joseph C. Hoeffel  
17 Joseph C. Hoeffel  
18 Attorney for Plaintiff  
19 WARREN SPIES

20 IT IS SO ORDERED

21 DATED: April 8, 2020

22   
23 \_\_\_\_\_  
24 Troy L. Nunley  
25 United States District Judge  
26  
27  
28